

FILED

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

NOV 02 2021

U.S. DISTRICT COURT-WVND
CLARKSBURG, WV 26301

UNITED STATES OF AMERICA,

v.

CYNTHIA MILLER,
DUSTIN MILLER,
MARKITTA MILLER, and
STACEY MORELAND,

Defendants.

Criminal No. 1:21-cr-01 TSK/MJA

Violations: 18 U.S.C. § 1343
18 U.S.C. § 1349

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy to Commit Wire Fraud)

1. From in or around March 2019, and continuing through in or around July 2019, in Taylor County and Preston County, in the Northern District of West Virginia, and elsewhere, defendants **CYNTHIA MILLER, DUSTIN MILLER, MARKITTA MILLER, and STACEY MORELAND**, did knowingly combine, conspire, confederate, agree, and have a tacit understanding with each other to commit wire fraud in violation of Title 18, United States Code, Section 1343.

Object of the Conspiracy

2. The object of the conspiracy was for defendants **CYNTHIA MILLER, DUSTIN MILLER, MARKITTA MILLER, and STACEY MORELAND** to unlawfully profit from a fraudulent insurance claim resulting from a staged motor vehicle accident.

Manner and Means of the Conspiracy

3. As part of the conspiracy, **CYNTHIA MILLER, DUSTIN MILLER, MARKITTA MILLER, and STACEY MORELAND** staged a motor vehicle accident in Taylor County, which involved intentionally damaging a vehicle and feigning injuries.

4. As further part of the conspiracy, **CYNTHIA MILLER and MARKITTA MILLER**, subsequently filed and caused the filing of materially false insurance claims to collect monetary settlements from an insurance company for vehicle damages and personal injuries.

5. As further part of the conspiracy, **CYNTHIA MILLER, DUSTIN MILLER, MARKITTA MILLER, and STACEY MORELAND** used and caused the use of interstate wire communications to provide false information about the staged accident, transmit medical records, and obtain insurance proceeds.

All in violation of Title 18, United States Code, Section 1349.

COUNTS TWO THROUGH SEVEN

(Wire Fraud)

1. Paragraphs 1 through 5 of Count One are incorporated herein by reference as if repeated and re-alleged in full.

2. From in or around March 2019, and continuing through in or around July 2019, in Taylor County and Preston County, in the Northern District of West Virginia, and elsewhere, defendants **CYNTHIA MILLER, DUSTIN MILLER, MARKITTA MILLER, and STACEY MORELAND**, devised and intended to devise a scheme and artifice to defraud an insurance company and health care providers to obtain money by means of false and fraudulent pretenses, representations, and promises.

The Scheme to Defraud

It was part of the scheme to defraud that:

3. Defendants **CYNTHIA MILLER and DUSTIN MILLER** coordinated a staged vehicle collision in Taylor County, West Virginia. Defendants **MARKITTA MILLER and STACEY MORELAND** assisted with the staged accident.

4. Defendant **MARKITTA MILLER** fabricated injuries as part of the staged accident and subsequently sought unnecessary medical care and diagnostic tests at Preston Memorial Hospital.

5. Defendants **CYNTHIA MILLER, DUSTIN MILLER, MARKITTA MILLER, and STACEY MORELAND** made materially false statements to insurance company representatives and others about the circumstances of the staged accident and purported injuries sustained therefrom.

6. Defendants **CYNTHIA MILLER and MARKITTA MILLER** submitted materially false insurance claims, and eventually received insurance settlements totaling approximately \$6,500.

7. On or about the dates below, for the purpose of executing, and attempting to execute, the scheme to defraud the insurance company and health care providers, and for obtaining money and property, defendants **CYNTHIA MILLER, DUSTIN MILLER, MARKITTA MILLER, and STACEY MORELAND** transmitted and caused to be transmitted by means of wire communication in interstate commerce writings, signs, signals, pictures and sounds, each transmission constituting a separate count:

COUNT	DATE	WIRE COMMUNICATION
2	4/30/2019	Phone call by CYNTHIA MILLER in West Virginia to an insurance company representative in New York
3	5/1/2019	Phone call between CYNTHIA MILLER in West Virginia and an insurance company representative in Virginia.
4	5/1/2019	Phone call between DUSTIN MILLER in West Virginia and an insurance company representative in Virginia.
5	5/7/2019	Phone call between STACEY MORELAND in West Virginia and an insurance company representative in Virginia.
6	5/22/2019	Phone call between MARKITTA MILLER in West Virginia and an insurance company representative in Virginia.
7	6/18/2019	Electronic payment initiated by insurance company in Virginia and resulting in \$2,800 deposit in MARKITTA MILLER's bank account in West Virginia.

All in violation of Title 18, United States Code, Section 1343.

A true bill,

/s/ _____
Foreperson

/s/ _____
WILLIAM J. IHLENFELD
United States Attorney

Andrew R. Cogar
Assistant United States Attorney